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2018 DEC -7 AM 11:07

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINAAlexander, Jr 7-head

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Officer James Parks  
Nurse Donna Miller  
Southern Health Partners inc.

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

**Complaint for Violation of Civil Rights**

(Prisoner Complaint)

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)Jury Trial: ☐ Yes ☐ No  
(check one)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

When submitted for filing, your complaint should be accompanied by the full filing fee or an application to proceed in *forma pauperis*.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Alex Head  
 All other names by which you have been known: Alexander Jr Head  
 ID Number \_\_\_\_\_  
 Current Institution Greenwood County Detention  
 Address Center, 528 Edgefield Avenue  
Greenwood, SC 29646

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name Officer Parks  
 Job or Title Guard Correctional Officer  
 (if known)  
 Shield Number \_\_\_\_\_  
 Employer Greenwood Detention Center  
 Address 528 Edgefield Avenue  
Greenwood, SC 29646  
☒ Individual capacity ☐ Official capacity

Defendant No. 2

Name Donna Miller

Job or Title Nurse  
 (if known)  
 Shield Number \_\_\_\_\_  
 Employer Southern Health Partners inc.  
 Address 528 Edgefield Avenue  
Greenwood, SC 29646

☒ Individual capacity ☒ Official capacity

## Defendant No. 3

Name Officer Delaura  
 Job or Title Correctional officer Guard  
 (if known)  
 Shield Number \_\_\_\_\_  
 Employer Greenwood Detention Center  
 Address 528 Edgefield Avenue  
Greenwood, SC 29646

☒ Individual capacity ☒ Official capacity

## Defendant No. 4

Name L.T. Chad Cox  
 Job or Title L.T.  
 (if known)  
 Shield Number \_\_\_\_\_  
 Employer Greenwood Detention Center  
 Address 528 Edgefield Avenue  
Greenwood, SC 29646

☒ Individual capacity ☒ Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

- ☐ Federal officials (a *Bivens* claim)  
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

8th amendment

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

officer Parks acted under color by  
striking me in the head as force with the  
door. He was wearing his uniform at work and he  
did this even tho he is being train not to do this

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee

"Lawsuit ~~5~~<sup>6</sup>" Hit and run and the"

on  
(L.t chadcox + staff) After effect - Put in P.C

From the first time I tried to speak with an Sgt. or Lt. about what had happen on Oct 24<sup>th</sup> I feel as if it was retaliation against me. Because I was place in 2C31 which is a lock down cell on part of the reason was that no one to see the knot that was on my forehead. I was there for six days and the reason was from what Lt chadcox say about it is I dis obey a officer of the law. And from my research I now know that Lt chadcox and his staff, Violated my rights of my constitutional right as in (Dealing with Retaliation olim V. Walsinekona 460 U.S. 238 (1983) when I alex Head went to him as Lt chadcox and them as the staff for help and I was put in 2C for it.

- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain) pretrial detainee

#### IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

Greenwood County Detention Center on MS  
B-unit in Room #210 on Oct. 24, 2018

- C. What date and approximate time did the events giving rise to your claim(s) occur?

10-24-18 9:15-9:40 at night  
 \_\_\_\_\_  
 \_\_\_\_\_

- D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

officer Parks slammed the door in my face, causing  
my neck to jerk back no one else was involved.  
also Lt. Luke Clark saw what happened on video

Jeffery Wilson, Donna Miller, Madell Hamilton  
 Luke LT. LARK, Officer Mathis  
 Officer Gresham and Officer Delaura

## V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

my injuries were, the knot on my forehead my neck  
 along with across the top of my shoulders were hurting  
 very badly, and the only medical treatment I  
 received when I went to sick call the next day was  
 was giving I.B. Profine and tylenol for 3 days  
 and 15 days later I received an XRAY of my Head  
 and shoulder, on all I was told that there wasn't  
 any broken bones.

## VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Emotional distress, pain & suffering  
 and also them not following protocol  
 I'm asking for the amount of \$80,000  
 and a relief does to the ways in actions

## VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.



## Part 2 VI. Belief

From my pain and suffering I went threw and still, going threw, with pain in my neck down to my shoulders blades, Are still in pain as I speak, My Ex-rays The doctor said there was no broken bones, but my body feels damage like they are broken. I'm asking for atleast \$80,000 dollars, Greenwood Detention Center needs to be investigated for all the innocent people that died under the care of medical. Or C.O., sgt or Lt, Nurses they offered you Inprofin or tynol for pain. It doesn't matter what pain ur in That's what inmates get and back to the unit to ur room with the same pain you visit medical with.

Alex Head



- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Greenwood Detention Center  
in Greenwood SC 29646

- B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

- C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☐ No

☒ Do not know

If yes, which claim(s)?

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

- ☐ Yes  
☒ No

E. If you did file a grievance:

1. Where did you file the grievance?

In sick call on the kiosk aka "computer"  
 on the 10-24-18 at 9:47 at late  
 night

2. What did you claim in your grievance?

That I was hit with the door  
 to my forehead and also made my  
 neck jerk back

3. What was the result, if any?

The Grievance I put in did get me to sick  
 call to try and get checked out, But once  
 I got there I didn't really get checked out at all  
 therefore I Really didn't get any results

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

The Head Nurse Donna Miller didn't want  
 to help there for I had to wait a week to the 2<sup>nd</sup>  
 Nurse came on to speak with Her and She  
 is the Nurse that got me the X Rays

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

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2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

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G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

I tried to speak with Lt. Chad Cox about my  
claim and was placed in PC 31 for six(6) days and  
that in cell for Bad inmates Not the Hurt ones

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

### VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If so, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

\_\_\_\_\_

\_\_\_\_\_

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court *(if federal court, name the district; if state court, name the county and State)*

\_\_\_\_\_

3. Docket or index number

\_\_\_\_\_

4. Name of Judge assigned to your case

\_\_\_\_\_

5. Approximate date of filing lawsuit

\_\_\_\_\_

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

\_\_\_\_\_  
 \_\_\_\_\_

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No

- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) \_\_\_\_\_

Defendant(s) \_\_\_\_\_

2. Court *(if federal court, name the district; if state court, name the county and State)*

\_\_\_\_\_  
 \_\_\_\_\_

3. Docket or index number

\_\_\_\_\_

4. Name of Judge assigned to your case

\_\_\_\_\_

5. Approximate date of filing lawsuit

\_\_\_\_\_

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. \_\_\_\_\_

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)
- \_\_\_\_\_
- \_\_\_\_\_

## IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/17, 2018.

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

City

State

Zip Code

### B. For Attorneys

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm



Address

Telephone Number

E-mail Address

528 Edgefield St Greenwood S.C. 29646  
My sister, Annimee, William (470-326-8846)  
Richardwatson4275@gmail.com